



MISSOURI DEPARTMENT OF NATURAL RESOURCES  
HAZARDOUS WASTE PROGRAM  
SMALL QUANTITY GENERATOR  
INSPECTION RECORD AND CHECKLIST

S

SQG-INSP.

ONLY FOR FACILITIES THAT GENERATE/ACCUMULATE < 1000 Kg (2,200 lbs. or approximately, 5 drums)

NAME PMS Consolidated		DATE 12-9-92	EPA I.D. NUMBER MO0093749919
ADDRESS 7 Guenther Blvd		RR NO.	MO I.D. NUMBER 010763
CITY ST. PETERS	NUMBER OF EMPLOYEES 44	YEARS AT SITE Since '73	TELEPHONE NUMBER

FACILITY REPRESENTATIVE(S), TITLE(S)

Carl Elsa - Plant Manager

DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT

Manufacture color pigments for plastics.  
The facility blends color resins to customer specs. The resins are then melted and formed into strands of colored plastics. These strings then are cut into small pellets. The pellets of plastic are shipped to the customers to be used as colorants.  
The facility generated hazardous waste from the blending room where the resins are mixed.  
(Refer to comment section of this checklist for description)

WASTE STREAMS

DESCRIBE EACH WASTE STREAM GENERATED INCLUDING THE PRODUCTION PROCESS	GENERATION RATE	EPA ID NUMBER	DISPOSITION
1. Waste Polyethylene Plastic & Colorants Dry Powders from blending Room	330 lbs/ Yr	D008	Fuel Blended
2.			
3.			
4.			
5.			

443653



RCRA RECORDS

CHECK ALL THAT APPLY (Specify if possible)

- |                                       |   |   |
|---------------------------------------|---|---|
| <input type="checkbox"/> NPDES Permit | <input type="checkbox"/> Lead/Acid Batteries          | <input type="checkbox"/> POTW                     |
| <input type="checkbox"/> Septic Tank  | <input type="checkbox"/> H.W. Burner/Blender/Marketer | <input type="checkbox"/> Solid Waste Landfill     |
| <input type="checkbox"/> Air Permit   | <input type="checkbox"/> Precious Metal Reclamation   | <input type="checkbox"/> Waste Water Pretreatment |

# A. GENERAL

1. <input checked="" type="checkbox"/> Registered as a HW Generator - Section 260.380.1 (1) RSMo and 10 CSR 25-5.262 (2)(A)	GGR
2. <input checked="" type="checkbox"/> Facility determines if waste is hazardous - 10 CSR 25-5.262(1) incorporating 40 CFR 262.11	GGR
3. <input checked="" type="checkbox"/> Utilizes a licensed hazardous waste transporter - Section 260.380.1 (5) RSMo	GGR
4. <input checked="" type="checkbox"/> Utilizes authorized HW TSD or RR facility - Section 260.380.1(7) RSMo	GGR
5. <input checked="" type="checkbox"/> Facility does not operate as a TSD - Section 260.390(1) RSMo	GGR

# COMMENTS

## PART 1: WALK-THROUGH INSPECTION

# B. PRETRANSPORT, CONTAINERIZATION & STORAGE

1. <input checked="" type="checkbox"/> Storage does not exceed 180 days (270 days if transported > 200 miles) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(e)	GSQ
2. <input checked="" type="checkbox"/> Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.171	GPT
3. <input checked="" type="checkbox"/> Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.172	GPT
4. <input checked="" type="checkbox"/> Containers closed in storage - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.173(a)	GPT
5. <input checked="" type="checkbox"/> Containers storing incompatible waste separated or protected from each other by a dike, berm or wall - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.177(c)	GPT
6. <input checked="" type="checkbox"/> Containers of ignitable or reactive waste stored > 50 ft. from property line (or meet requirements) - 10 CSR 25-5.262 (2)(C)5. referencing 40 CFR 265.176 as amended by 10 CSR 25-7.265 (2)(I)3.	GOR
7. <input type="checkbox"/> Waste packaged/labeled/marked per DOT during entire on-site storage period - 10 CSR 25-5.262 (2)(C)1.	GOR
8. <input type="checkbox"/> Date of accumulation marked on containers - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(2)	GPT
9. <input checked="" type="checkbox"/> Containers protected from contact with accumulated liquids - 10 CSR 25-5.262(2)(C)2.B.(II)	GOR
10. <input type="checkbox"/> Containers clearly marked "hazardous waste" - 10 CSR 25-5.262(I) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3)	GPT
11. <input checked="" type="checkbox"/> Facility inspected and maintained (weekly) - 10 CSR 25-5.262(2)(C)2.A.(II)	GPT
12. <input checked="" type="checkbox"/> Daily inspection of areas subject to spills, ie. waste handling areas - 10 CSR 25-5.262(2)(C)2.A.(II)	GOR
13. <input checked="" type="checkbox"/> Adequate aisle space is available - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.35	GPT
14. <input checked="" type="checkbox"/> Placards available for transporter - 10 CSR 25-5.262(1) incorporating 40 CFR 262.33	GPT
15. <input checked="" type="checkbox"/> "No Smoking" signs conspicuously placed by ignitable or reactive wastes - 10 CSR 25-5.262(2)(C)2.D.(II)	GOR
16. <input checked="" type="checkbox"/> Waste oil containers in good condition, labeled and closed - 10 CSR 25-11.010(3)(C)	GOR

# COMMENTS

The three drums in storage were not marked properly  
Not marked on the three drums that were in storage at time of inspection

# C. SATELLITE ACCUMULATION

1. <input checked="" type="checkbox"/> Containers kept closed - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173	GPT
2. <input checked="" type="checkbox"/> Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.171	GPT
3. <input checked="" type="checkbox"/> Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.172	GPT
4. <input checked="" type="checkbox"/> Quantities accumulated not exceeding 55 gal. (1 quart of acutely-hazardous wastes) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)	GPT
5. <input checked="" type="checkbox"/> Satellite containers go to storage within 3 days of filling - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)3.	GPT
6. <input type="checkbox"/> Container marked identifying contents & beginning date - 10 CSR 25-5.262(2)(C)3.	GOR

# COMMENTS

None on site At Time of Inspection

7. <input type="checkbox"/> Stored in satellite areas less than 1 year - 10 CSR 25-5.262(2)(C)3.	GOR	COMMENTS		
<b>D. PREPAREDNESS AND PREVENTION AND EMERGENCY PROCEDURES</b>				
1. <input checked="" type="checkbox"/> Facility operated and maintained to minimize the possibility of an emergency - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.31	GPT	COMMENTS		
2. <input checked="" type="checkbox"/> Adequate and proper spill control, decontamination and safety equipment available (fire blankets, respirators, SCBA, absorbents, etc.) and properly tested and maintained - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34 (d)(4) referencing 40 CFR 265 Subpart C.	GPT			
3. <input checked="" type="checkbox"/> Adequate water supply and fire control equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(d)	GPT			
4. <input checked="" type="checkbox"/> Communication and emergency equipment tested and maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.33	GPT			
5. <input checked="" type="checkbox"/> Emergency coordinator's name and phone number posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ			
6. <input checked="" type="checkbox"/> Telephone number of fire department posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(iii)	GSQ			
7. <input checked="" type="checkbox"/> Location of fire extinguisher and spill control equipment posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ			
8. <input checked="" type="checkbox"/> Employees familiar with waste handling and emergency procedures - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(iii)	GSQ			
9. <input checked="" type="checkbox"/> Device in the hazardous waste operation area capable of summoning emergency assistance - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.34(a)	GPT			
10. <input checked="" type="checkbox"/> Telephone or two-way radio onsite and capable of summoning local fire or police dept. - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(b)	GPT			
<b>E. SQG TANKS</b>				
TANK DESIGNATION	CONTENTS	CAPACITY	CONTAINMENT	AGE
1.				
2.				
3.				
1. <input checked="" type="checkbox"/> Uncovered tanks have 2 ft. freeboard or containment system - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(3)	GPT	COMMENTS  <i>NONE Onsite</i>		
2. <input checked="" type="checkbox"/> Continuously fed tanks equipped with a feed cut-off system or a proper by-pass system - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(4)	GPT			
3. <input checked="" type="checkbox"/> Waste and/or treatment method is compatible with tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(2)	GPT			
4. <input checked="" type="checkbox"/> Incompatible wastes not placed in same tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(f)	GPT			
5. <input checked="" type="checkbox"/> Ignitable or reactive wastes rendered safe/protected from sources of ignition or reaction - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(e)(1)	GPT			
6. <input checked="" type="checkbox"/> Ignitable or reactive wastes in covered tanks treated/stored in accordance with NFPA's buffer zone requirements - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(e)(2)	GPT			
7. <input checked="" type="checkbox"/> Volatiles with vapor pressure > 78 mm Hg @ 25° C not placed in open tanks - 10 CSR 25-5.262(2)(C)2.D.(I)	GOR			
8. <input checked="" type="checkbox"/> Wastes and residues removed from tank and equipment, and handled properly upon closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(d)	GPT			
9. <input type="checkbox"/> Tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3).	GPT			

10. <input type="checkbox"/> Inspection of waste feed cut off, bypass system, monitoring data and freeboard each operating day - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(c)	GPT	COMMENTS
11. <input type="checkbox"/> Weekly inspection of confinement structure, construction materials and general area for leaks, corrosion or discharges - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(c)5	GPT	
12. <input type="checkbox"/> Waste oil tanks in good condition, labeled and closed - 10 CSR 25-11.010(3)(C)	GOR	

## PART 2: RECORDS INSPECTION

### F. MANIFESTS

1. <input checked="" type="checkbox"/> Facility uses manifest system or wastes reclaimed under contractual agreement - 260.380.1(6) RSMo, and 10 CSR 25-5.262(2)(B)	GMR	COMMENTS  using Arkansas manifests, but not putting consecutive shipment numbers on them  Missing license plate numbers
2. <input checked="" type="checkbox"/> Generator maintains a copy of the contractual agreement on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(e)(2)	GMR	
3. <input checked="" type="checkbox"/> Records maintained for a 3-year period - 10 CSR 25-5.262(1) incorporating 40 CFR 262.40(a)	GRR	
4. <input checked="" type="checkbox"/> Generator's MO & EPA I.D. Numbers - 10 CSR 25-5.262(2)(B)	GOR	
5. <input type="checkbox"/> Manifest document, ID and consecutive shipment numbers - 10 CSR 25-5.262(2)(B)2.A	GOR	
6. <input checked="" type="checkbox"/> Generator's name, address and phone number - 10 CSR 25-5.262(2)(B)1.	GMR	
7. <input type="checkbox"/> All transporters' names, phone numbers, license plate #s, MO & EPA I.D.#'s - 10 CSR 25-5.262(2)(B)2.	GMR	
8. <input checked="" type="checkbox"/> Designated facility name, address, phone, MO & EPA I.D. #, - 10 CSR 25-5.262(2)(B)1.	GMR	
9. <input checked="" type="checkbox"/> DOT shipping name, Hazard Class and waste I.D. # (RQ - if required) - 10 CSR 25-5.262(2)(B)2.	GMR	
10. <input checked="" type="checkbox"/> Containers, quantity and specific gravity designated - 10 CSR 25-5.262(2)(B)2.	GMR	
11. <input checked="" type="checkbox"/> Manifest signed and dated - 10 CSR 25-5.262(2)(B)1.	GMR	
12. <input checked="" type="checkbox"/> Out of state manifests have all required MO information - 10 CSR 25-5.262(2)(B)4.A	GOR	
13. <input checked="" type="checkbox"/> Manifest continuation sheets are not used - 10 CSR 25-5.262(2)(B)1	GOR	
14. <input checked="" type="checkbox"/> Manifest returned within 35 days - or exception report submitted within 45 days - 10 CSR 25-5.262(2)(D)2.C	GRR	
15. <input checked="" type="checkbox"/> Summary Manifest Reports and manifest copies sent to DNR quarterly - 10 CSR 25-5.262(2)(D)1	GOR	
16. <input checked="" type="checkbox"/> Tests waste or uses knowledge of waste to determine if the waste is restricted from land disposal - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	
17. <input checked="" type="checkbox"/> "Land-Ban" notification/certification sent with manifests or with 1st shipment under a tolling agreement & retained on-site for 5 years - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	
18. <input checked="" type="checkbox"/> Notification/certification includes correct EPA Hazardous Waste number, corresponding treatment standards, manifest number, and waste analysis data - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	

### G. PREPAREDNESS AND PREVENTION

1. <input checked="" type="checkbox"/> Arrangements with local emergency agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37	GPT	COMMENTS
2. <input checked="" type="checkbox"/> Emergency coordinator(s) on premise or on call - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(i)	GSQ	

### H. WASTE OIL

1. <input checked="" type="checkbox"/> Waste oil is managed properly and not disposed of into the environment - 10 CSR 25-11.010(1)(D).	GOR	COMMENTS  None On Site
2. <input checked="" type="checkbox"/> Listed hazardous waste mixed with waste oil is handled as a hazardous waste - 10 CSR 25-11.010(1)(C)2.	GOR	
3. <input type="checkbox"/> Registered as waste oil generator if gen./accum. 220 lb. - 10 CSR 25-11.010(2)(A)	GOR	
4. <input type="checkbox"/> Written waste oil contract maintained - 10 CSR 25-11.010(4)(C)	GOR	
5. <input type="checkbox"/> Uses a licensed transporter and receiving facility - 10 CSR 25-11.010(4)	GOR	

# **I. RESOURCE RECOVERY**

1. <input checked="" type="checkbox"/> RR certification for energy recovery or reclamation of waste oil or hazardous waste on-site - 10 CSR 25-9.020(1)(A)3	GOR
2. <input checked="" type="checkbox"/> Still bottoms or RR residues disposed of properly - Section 260.380-1(5) RSMo	GOR
3. <input type="checkbox"/> Facility is classified as U, R1, or R2 accurately - 10 CSR 25-9.020(3)(A).	GOR
4. <input type="checkbox"/> Facility meets the operating conditions of certification - 10 CSR 25-9.020(3).	GOR
5. <input type="checkbox"/> Facility has submitted a written request and received approval from the DNR for all changes in operation including closure - 10 CSR 25-9.020(3)(E)1 and 2.	GOR
6. <input type="checkbox"/> Facility report submitted to DNR quarterly - 10 CSR 25-9.020(3)(E)6. referencing 10 CSR 25-7.264(2)(E)3.	GOR
7. <input type="checkbox"/> Facility maintains a complete written operating record - 10 CSR 25-9.020(3)(E)5. referencing 40 CFR 264.73(b)(1) and (2) as modified by 10 CSR 25-7.264(2)(E)2.	GOR
8. <input type="checkbox"/> Facility has notified EPA and the state that it qualifies for a small quantity on-site burner exemption or has interim status or a permit if it burns hazardous waste on-site - 10 CSR 25-7.266(1) incorporating 40 CFR 266.108 and 40 CFR 266.103.	GOR

## **COMMENTS**

*Not operating a R.R. Unit*

## **CHECKLIST KEY**

Check the ☒ if in compliance.

Circle the ☐ if not in compliance and provide comment.

N/A = Not Applicable

A shaded item is a serious deviation from the requirements (Class I violation)

An unshaded item is a significant deviation from the requirements (Class II violation unless conditions warrant Class I)

## **COMMENTS: INCLUDE DISCUSSION OF FACILITY'S WASTE MINIMIZATION PLAN**

- Prior to 1/92 the facility shipped off site large quantities of HW. However, after 1/92 the facility started recycling the waste pigments through a composite machine, as part of the process, which melts the pigments. The melting process makes the waste non-hazardous
- Inside the blending Room there is a floor drain which passes through a wastewater treatment system where the solids are collected.
- Both of the above have been tested and found to be non-hazardous but are disposed of as special waste
- The only HW comes from acrylic powders which can not be compounded (melted). These powders are accumulated and sent off site.

INSPECTOR'S SIGNATURE

*Gary Meyer*

DATE

*12-9-92*

Code #

13968

**L/AID/LAW****Special Waste Acceptance Application**

Generator Name: PMS CONSOLIDATED  
 Address: 7 GUENTHER BLVD  
ST. PETERS MO 63376  
 Telephone: (314) 278-5090  
 Generator Contact: CARL EISEN  
 General Material Description: WASTEWATER SOLIDS

Originating Division: \_\_\_\_\_  
 Disposal Facility: \_\_\_\_\_  
 Location: \_\_\_\_\_  
 Waste Quantities: 1 Units: Cubic Yds. ☐ Tons ☒  
 Frequency of Receipt: Daily ☐ Weekly ☐ Monthly ☒ One Time ☐  
 Other \_\_\_\_\_

Process Generating Waste: WASTEWATER PRETREATMENT

Physical Properties: Physical State at 70°F: Solid ☒ Semisolid ☐ Liquid ☐ Density: \_\_\_\_\_ #/CY Color: \_\_\_\_\_  
 Viscosity: Low ☐ Medium ☐ High ☐ Flash Point: 220°F Odor: Yes ☐ No ☒  
 Water Content: <10 % by Weight Paint Filter Test: Passed ☒ Failed ☐  
 Reactive: No ☒ Yes ☐ With \_\_\_\_\_  
 Waste pH: 7-8 Infectious: Yes ☐ No ☒

Chemical Properties: (Concentrations in mg/l)

(TCLP)	Arsenic	<u>&lt;0.05</u>	m-Cresol	<u>&lt;0.04</u>	Hexachlorobenzene	<u>&lt;0.04</u>	Pyridine	<u>&lt;0.04</u>
	Barium	<u>&lt;1.0</u>	p-Cresol	<u>&lt;0.04</u>	Hexachlorobutadiene	<u>&lt;0.04</u>	Selenium	<u>0.05</u>
	Benzene	<u>&lt;0.005</u>	Cresol	<u>&lt;0.04</u>	Hexachloroethene	<u>&lt;0.04</u>	Silver	<u>&lt;0.01</u>
	Cadmium	<u>0.242</u>	2,4-D	<u>&lt;0.005</u>	Lead	<u>0.80</u>	Tetrachloroethylene	<u>0.012</u>
	Carbon Tetrachloride	<u>&lt;0.005</u>	1,4 Dichlorobenzene	<u>&lt;0.04</u>	Lindane	<u>&lt;0.005</u>	Toxaphene	<u>&lt;0.005</u>
	Chlordane	<u>&lt;0.005</u>	1,2 Dichloroethane	<u>&lt;0.005</u>	Mercury	<u>&lt;0.005</u>	Trichloroethylene	<u>&lt;0.005</u>
	Chlorobenzene	<u>&lt;0.005</u>	1,2-Dichloroethylene	<u>&lt;0.005</u>	Methoxychlor	<u>&lt;0.005</u>	2,4,5-Trichlorophenol	<u>&lt;0.02</u>
	Chloroform	<u>&lt;0.005</u>	2,4-Dinitrotoluene	<u>&lt;0.04</u>	Methyl Ethyl Ketone	<u>&lt;0.10</u>	2,4,6-Trichlorophenol	<u>&lt;0.04</u>
	Chromium	<u>&lt;0.5</u>	Endrin	<u>&lt;0.005</u>	Nitrobenzene	<u>&lt;0.04</u>	2,4,5TP (Silvex)	<u>&lt;0.005</u>
	o-Cresol	<u>&lt;0.04</u>	Heptachlor (& hydroxide)	<u>&lt;0.005</u>	Pentachlorophenol	<u>&lt;0.10</u>	Vinyl Chloride	<u>&lt;0.01</u>

Other (list): \_\_\_\_\_

Other Information: Delivery Method: Bulk ☒ Other ☐Regulatory Agency Approval Received: Yes ☐ No ☒ Permit Number \_\_\_\_\_Material Safety Data Sheet Provided: Yes ☐ No ☒**GENERATOR CERTIFICATION**

To the best of my knowledge, the information provided above is accurate and the material is not classified as a hazardous waste in accordance with current regulations.

Authorized Representative

Signature

Name CARL EISENTitle Owner**FOR OFFICE USE ONLY**

Conditions for Acceptance \_\_\_\_\_

1. Originating Division Manager	_____	Date	_____
2. Disposal Facility Manager	_____	Date	_____
3. District Manager	_____	Date	_____



OFFICE USE ONLY

Special Waste I.D. \_\_\_\_\_

Special Waste Registration No. \_\_\_\_\_

**ST. LOUIS COUNTY**  
**APPLICATION FOR DISPOSAL OF SPECIAL WASTE**

The undersigned is applying for authorization to dispose of Special Waste in St. Louis County as provided by Chapter 607, Section 860, 1987.

**IMPORTANT:** Application must be completed in full (Do not leave any sections blank) and accompanied by Missouri Department of Natural Resource's Special Waste Approval.

**Generator (To Be Completed By Generator)**

Company/Individual PMS ConsolidatedMailing Address 7 Guenther BlvdCity, State, Zip St. Peters MO 63376Contact Person Carl Elsea

Telephone ( ) \_\_\_\_\_

**Generation Rate (To Be Completed By Generator)**

One Time Disposal \_\_\_\_\_ cu. yds.

Periodic/Continuous 40 cu. yds. per MO (mo., yr.)

**Waste Information (To Be Completed By Generator)**

Waste Description Plastic purge and plastic chipsLocation of generated waste 7 Guenther Blvd St Peters MO 63376Briefly describe the process by which this waste is generated. Enclose a process flow chart if available. Purge is generatedduring the cleaning process of plastic extruders, plastic chips are waste from our injection molding machinesPhysical Characteristics (Color, Odor, Consistency, etc.) Solid plastic in large chunks, small chips and pellets, no odor, color varies

Chemical Characteristics (Attach a completed copy of the Missouri Department of Natural Resources Special Waste Disposal Request if applicable and laboratory analyses performed). \_\_\_\_\_

For neutralized infectious and hazardous, describe the method(s) of neutralization: (i.e., autoclaving, incineration, etc.). N/AName of neutralization company if different from generator. N/AFor neutralized infectious and hazardous waste, please describe the quality control safeguard(s) used including indicator(s): (i.e., time/temp. charts, bacillus stearothermophilus spore assay, chamber retention times and temps., etc.). N/A

**Transportation (To Be Completed By Generator)**

Waste Hauling Company LIDLAW WASTE SYSTEMS, INC.Mailing Address 1838 N. BROADWAYCity, State, Zip ST. LOUIS, MISSOURI 63102

Contact Person \_\_\_\_\_

Telephone (314) 241-3710County Hauling Vehicle Permit Number(s) 287-299County Hauling Container Permit Number(s) 86-198

**Disposal (To Be Completed By Disposal Facility)**

Waste loads shall be individually recorded at the disposal facility. St. Louis County's approval is contingent upon the disposal facility's agreement to accept this Special Waste.

Disposal Facility LIDLAW WASTE SYSTEM'S - BRIDGETON LANDFILL

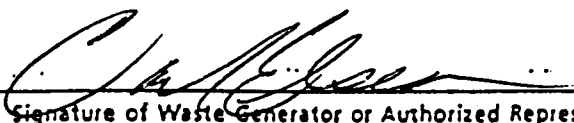
Contact Person \_\_\_\_\_

Environmental Company (If applicable)

Company EnviroSearch  
Mailing Address 608 East Wilminston Ave  
City, State, Zip Salt Lake City Utah 84106  
Contact Person Ralph Helfer Telephone (801) 466-1035

Certification (To Be Completed By Generator And Disposal Facility)

I, the undersigned, submit this request to dispose of the named waste under SLCRO Chapter 607, 1987, and certify that the waste named herein and as shown is not a hazardous waste as defined by the Missouri Waste Management Law and Rules. All infectious waste has been completely neutralized and managed in accordance with the Missouri Solid Waste Managment Law and Rules.

  
Signature of Waste Generator or Authorized Representative

Date 12-27-90

Carl Elsea Plant Manager

Print Name and Title

Signature of Disposal Facility or Authorized Representative

Date \_\_\_\_\_

Print Name and Title

Application Fee: Please remit \$50.00

To:

D.O.C.H.M.C.  
Waste Management Section  
111 South Meramec Avenue  
Clayton, MO 63105

..... FOR WASTE MANAGEMENT OFFICE USE ONLY .....

\_\_\_\_ Approved

\_\_\_\_ Expiration Date

\_\_\_\_ Disapproved

Other Conditions: \_\_\_\_\_

Signature of Director of Health or Authorized Agent

Date \_\_\_\_\_

Print Name and Title





MISSOURI DEPARTMENT OF NATURAL RESOURCES  
WASTE MANAGEMENT PROGRAM  
SPECIAL WASTE DISPOSAL REQUEST

SECTION I GENERAL INFORMATION (TO BE COMPLETED BY THE GENERATOR AND LANDFILL OPERATOR)

DISPOSAL FACILITY	WASTE GENERATOR
NAME LAIDLAW WASTE SYSTEMS, INC. BRIDGETON LANDFILL	PMS Consolidated
ADDRESS 13570 ST. CHARLES ROCK RD.	7 Guenther Blvd
CITY, STATE, ZIP CODE BRIDGETON, MO. 63044	St. Peters MO 63376
TELEPHONE NUMBER 1-314-739-1919	1-314-278-5090
PERMIT NO. 118912	N/A
CONTACT PERSON	Carl Elsea

SECTION II WASTE CHARACTERIZATION (TO BE COMPLETED BY THE GENERATOR)

A. NAME OF WASTE  
Pigment Sludge

B. DESCRIPTION OF GENERATION PROCESS  
Pigment waste is generated when dirty water is treated before being release to city

C. (CHECK ONE)  
(1.) ☐ SOLID (2.) ☒ SLUDGE (20% OR GREATER SOLIDS) (3.) ☐ SLURRY (20% OR LESS SOLIDS)  
(4.) ☐ LIQUID (5% OR LESS SOLIDS) (5.) ☐ OTHER - SPECIFY \_\_\_\_\_

(INDICATE) % SOLIDS BY WEIGHT 85% ;  
SPECIFIC GRAVITY N/A ; PUMPABLE: ☐ YES ☒ NO; ODOR: ☐ YES ☐ NO; FREE FLUID: ☐ YES ☐ NO;  
PH 7-8 ; FLASHPOINT \_\_\_\_\_

D. WAS THE WASTE EVER CLASSIFIED OR LISTED HAZARDOUS? ☐ YES ☒ NO IF YES, SPECIFY THE EPA WASTE NUMBER \_\_\_\_\_

E. LIST BELOW THE CHEMICAL COMPOSITION (ATTACH ANY ADDITIONAL ANALYSIS)

MAJOR COMPONENTS		% BY WEIGHT
1.	Mostly inorganic pigments	N/A
2.	Some heavy metal pigments	N/A
3.		
4.		

F. SOURCE OF CHEMICAL DATA

SECTION III GENERATION RATE/DISPOSAL FREQUENCY\* (TO BE COMPLETED BY GENERATOR)

A. AVERAGE GENERATION RATE (CUBIC YARDS PER WEEK, POUNDS PER MONTH, ETC.) Approx 1250 lbs per month

B. DISPOSAL REQUEST [COMPLETE (1) OR (2)]:  
(1) ☒ Continual (or intermittent)  
If disposal is to be made on a continual or intermittent basis, indicate the quantity and frequency of disposal 1250 lbs per month  
yards per week, pounds per month, etc.)  
Indicate the quantity available for immediate disposal, if applicable \_\_\_\_\_  
(2) ☐ One - time only  
If one - time only, indicate the total amount to be disposed of \_\_\_\_\_

\*NOTE ► INDICATE APPROPRIATE UNITS (TONS, GALLONS, POUNDS, CUBIC YARDS, ETC.)

SECTION IV TRANSPORTATION (TO BE COMPLETED BY GENERATOR OR LANDFILL OPERATOR)

A. CONTAINERS USED FOR TRANSPORTATION (CHECK ONE)  
(1) ☒ BULK ( 40 CU. YD.); (2) ☐ METAL DRUMS ( \_\_\_\_\_ GAL.); (3) ☐ CASES, CARTONS (SIZE \_\_\_\_\_)  
(4) ☐ FIBER DRUMS ( \_\_\_\_\_ GALS.); (5) OTHER - SPECIFY \_\_\_\_\_

B. TYPE OF VEHICLE  
(1) ☐ TRACTOR-TRAILER; (2) ☒ ROLL-OFF/LUGGER; (3) ☐ DUMP TRUCK; (4) ☐ (OTHER) \_\_\_\_\_

**SECTION V DISPOSAL TECHNIQUES (TO BE COMPLETED BY THE LANDFILL OPERATOR)**

☐ **SEPARATE TRENCH BURIAL**

(1) LOCATION ON LANDFILL SITE \_\_\_\_\_

(2) TRENCH DESIGN PREVIOUSLY APPROVED BY DNR? ☐ YES ☐ NO IF NOT, ATTACH REQUEST FOR APPROVAL \_\_\_\_\_

**B. ☐ CO-DISPOSAL WITH MUNICIPAL WASTE ON ACTIVE FILL FACE**

1. AVERAGE DAILY QUANTITY OF MUNICIPAL SOLID WASTE \_\_\_\_\_ (SPECIFY TONS OR CUBIC YARDS)

2. SPECIAL WASTE TO BE UNLOADED AT: \_\_\_\_\_ TOE OF WORKING FACE

\_\_\_\_\_ TOP OF WORKING FACE

**C. ☐ OTHER DISPOSAL PROCEDURES - SPECIFY \_\_\_\_\_**

**SECTION VI HANDLING PROCEDURES (TO BE COMPLETED BY GENERATOR)**

Safety precautions during handling: Provide handling information supplied by product manufacturer, waste generator, or from other sources, describing the necessary measures that should be taken to protect personal safety, to control dusting, or to ensure fixed placement of waste. This should include a description of materials not compatible with this waste.

Non hazardous recommend safety goggles and gloves

**SECTION VII CERTIFICATION (TO BE COMPLETED BY GENERATOR AND LANDFILL OPERATOR)**

I, the undersigned, submit this request to dispose of the named waste and certify that the information supplied by me herein is correct. I understand approval to dispose of the waste may be suspended if false information has been submitted or if the disposal operation is not performed in a proper and legal manner.

SIGNATURE OF LANDFILL OPERATOR OR AUTHORIZED REPRESENTATIVE \_\_\_\_\_

PRINT NAME/TITLE \_\_\_\_\_

DATE \_\_\_\_\_

I, the undersigned, submit this request to dispose of the named waste and certify that the waste named herein, to the best of my knowledge, is not a hazardous waste as defined by the Missouri Waste Management Law and Rules, and that the information supplied by me is correct.

SIGNATURE OF WASTE GENERATOR OR AUTHORIZED REPRESENTATIVE \_\_\_\_\_

PRINT NAME/TITLE \_\_\_\_\_

DATE \_\_\_\_\_

Carl Elsea Plant Manager

12-27-90

ADDITIONAL COMMENTS

Additional Contact: Ralph Helfer

EnviroSearch

1-800-466-1035

1-800-731-4891 (home)

MAIL THE COMPLETED FORM TO:

MISSOURI DEPARTMENT OF NATURAL RESOURCES  
WASTE MANAGEMENT PROGRAM  
P.O. BOX 176  
JEFFERSON CITY, MISSOURI 65102



HANDLER NAME PMS Consolidated

St. Charles County  
PMS Consolidated

JOHN ASHCROFT  
Governor

G. TRACY MEHAN III  
Director



STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

Division of Energy  
Division of Environmental Quality  
Division of Geology and Land Survey  
Division of Management Services  
Division of Parks, Recreation,  
and Historic Preservation

December 22, 1992

Mr. Carl Elsa  
PMS Consolidated  
7 Guenther Blvd.  
St. Peters, Missouri 63376

DIVISION OF ENVIRONMENTAL QUALITY  
ST. LOUIS REGIONAL OFFICE  
10805 Sunset Office Drive, Suite 100  
St. Louis, MO 63127-1017  
314-822-0101  
Fax No. 314-822-0943

L.O.W. #92-SL.059

Dear Mr. Elsa:

On December 9, 1992 a Resource Conservation and Recovery and Missouri Hazardous Waste Management Compliance Evaluation was conducted at PMS Consolidated. The inspection was conducted by Mr. Gary Myers, Environmental Specialist, Missouri Department of Natural Resources (MDNR), St. Louis Regional Office (SLRO). The inspection was conducted under the authority of the Resource Conservation and Recovery Act (RCRA) of 1976 and Sections 260.375(9) and 260.377 of the Missouri Waste Management Law of 1977 as amended. The inspection was confined to facets of the operation relevant to hazardous waste management.

The following unsatisfactory features were observed during the inspection:

1. Containers of hazardous waste not marked or labeled per Department of Transportation (DOT) during the entire onsite storage period, in violation of 10 CSR 25-5.262(2)(C)1. The facility had three 55 gallon containers of hazardous waste onsite at the time of inspection. None of the containers were marked with the proper shipping name, name and address of the generator, and with the words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found, contact the nearest police of public safety authority or the U.S. Environmental Protection Agency." as referenced in the 40 CFR 262.32. The facility did have the labels required in the plant managers office but was under the assumption that the labels were not required until the drums were shipped. The facility must affix the proper labels and markings on the containers of hazardous waste when they are placed in the storage area.
2. Failure to mark containers of hazardous waste with the date of accumulation, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(2). The three containers of hazardous waste in the storage area did not have the dates of accumulation marked on them. The labels in the plant managers office did have the accumulation dates on them. The oldest container was 10/92. The facility in January 1992 changed their management practices. The facility now compounds the resins from the blending room. This process renders the resins non-hazardous. The only hazardous waste generated at the facility is acrylic resins which contain lead. These acrylic resins can not be compounded. This compounding of resins has greatly reduced the amount of hazardous wastes being



St. Charles County  
PMS Consolidated  
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shipped offsite. The facility has not made any shipments offsite since December 1991 and the three containers of hazardous waste onsite now were waiting for pickup day confirmation from Rineco. The facility must mark the containers of hazardous waste onsite now with the dates of accumulation and ensure that all containers stored in the future have the dates of accumulation marked on them.

3. Failure to use consecutive shipment numbers on manifests, in violation of 10 CSR 25-5.262(2)(B)2.A. The manifests being used by the facility were from Arkansas. These manifests were being prepared by Rineco and sent to PMS prior to pickup. The facility only filled in the quantity being shipped on the prepared manifest. The facility must fill in a consecutive number in the document number space on the Arkansas manifest. This must start with the next shipment of hazardous waste offsite and continue on any future shipments.
4. Failure to record the transporters license plate number of the waste carrying portion of the vehicle, in violation of 10 CSR 25-5.262(2)(B)2.C. The facility had not recorded the license plate number of the transport vehicle on any of the manifests viewed during the inspection. The facility must record the license plate number of the waste carrying portion of the transport vehicle on all manifests.

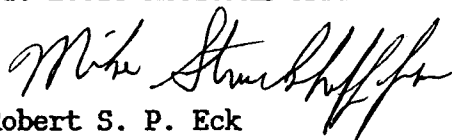
In order to document that corrective actions have been taken, you are requested to submit a written response no later than January 30, 1993. The response should describe the steps taken to correct the violation identified. Direct the response to Mr. Myers. You should also forward a copy of your response and supporting documentation to Mr. Bruce Martin, Chief, Hazardous Waste Enforcement, Waste Management Program, P.O. Box 176, Jefferson City, Missouri 65102.

It is our purpose by this letter to persuade you to take all necessary actions to comply with the Missouri Hazardous Waste Management Law. Failure to achieve timely resolution will result in the referral of this case for enforcement action by the Waste Management Program.

Should you have any questions or wish to confer in this matter, please call Mr. Myers or me at (314)822-0101.

Sincerely,

ST. LOUIS REGIONAL OFFICE

  
Robert S. P. Eck  
Regional Director

RSPE/GM/mc

✓ c: WMP